

AVESF

**RESULTS OF A CULTURAL RESOURCES SURVEY
OF THE AVERY LANDING PROJECT AREA,
SHOSHONE COUNTY, IDAHO**

By

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Prepared for

Ecology and Environment, Inc.
Seattle, Washington

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APPLIED ARCHAEOLOGICAL RESEARCH, INC. REPORT NO. 1095

USEPA SF



1496121

Liverman, Earl

From: Hall, Steven G. [SHall@ene.com]
Sent: Saturday, May 25, 2013 9:49 AM
To: Liverman, Earl
Subject: RE: draft interim archeological memorandum for Avery Landing

Earl -

I reviewed this, and I have some comments below.

Most importantly, it is not clear from this report whether Potlatch/Geoengineers will continue with the "inadvertent discovery plan" for any potential significant archaeological artifacts by field staff (who have been given awareness-level training) during excavation for the cleanup.

More specific comments below:

-- The first part (pages 1-2) appears to be a work plan, and the second part (beginning at the bottom of page 2) is a summary of the cultural investigation phase performed in May. The work plan section seems to imply that an archaeologist will be on site during cleanup. However, from the summary of the work performed in May, it appears that there will be no more cultural monitoring? In other words, it's not very clear how this specific investigation phase in May fits into the overall context of the cleanup and archaeology concerns. Did the work plan portion only apply to this May investigation phase, or the whole cleanup?

-- The report concludes with this statement: "Because the exploratory excavations conducted in May 2013 to further document features at the site gathered adequate information to complete the archaeological site characterization, no additional archaeological oversight for the project as it currently stands is warranted." This statement doesn't seem consistent with the work plan section and specifically the "discovery procedures." In addition to the five identified surface features, the AAR report also stated that other subsurface archaeological deposits could be present, which is the purpose of the inadvertent discovery plan and training of field staff. Does this conclusion mean that Potlatch will no longer do any monitoring during the excavation?

-- It's not clear what the scope or purpose of the "earthmoving activities" in May was in the context of the larger cleanup. I understand that these activities were specifically designed to investigate the features for cultural significance prior to the cleanup. However, it appears that the soil in this area was backfilled following this specific investigation phase. Did they encounter any contamination? Won't they have to re-excavate some or all of these areas as part of the cleanup? Did the excavation for this archaeology investigation extend as deep as would be required for cleanup?

-- Conclusion 2 of the CGA report indicates that CGA gave on-site personnel a briefing on what to look for as part of inadvertent discovery plan. However, it is not clear if this applied only to this May investigation phase or the whole project, and whether the same field staff will be present during later excavation phases.

-- Also, the CGA report does not accurately summarize AAR's statements with regard to the NRHP. The CGA report refers to the "draft AAR determination that the site is eligible for the National Register of Historic Places." But, AAR didn't say that. AAR's report states that, "As observed, the site is not likely to meet the registration requirements for the NRHP, because its information potential is low."

Thanks,
Steve

From: John M. Herzog [<mailto:jherzog@geoengineers.com>]
Sent: Friday, May 24, 2013 7:13 PM
To: Liverman, Earl (Liverman.Earl@epa.gov)
Cc: Hall, Steven G.; Terry Cundy; Abhi R. Joshi; Robert S. Trahan; John M. Herzog
Subject: draft interim archeological memorandum for Avery Landing

Earl –

Attached is the memorandum that you requested. This document summarizes the findings of the archeological pre-clear work that was completed in advance of the remedial excavation at Avery Landing.

We will keep the final report on the project open until all of the excavation work is completed. At that time, we will finalize the report and include a copy of it in the construction closeout report that will be prepared for EPA.

Please let me know if you have any questions.
See you in the field next week!

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Avery Landing Monitoring

Columbia Geotechnical Associates (CGA) is assisting GeoEngineers in remediation at the Avery Landing site. Cultural Resources compliance activities at the site include monitoring to record archaeological features and buried portions of the historic archaeological site that are not visible or known at present. CGA will conduct monitoring according to recommendations from previous cultural resources work on site by Applied Archaeological Research. These include:

1. Identification and documentation of known and newly identified archaeological features of interest.
2. Monitoring of the project for unknown archaeological resources.
3. Reporting of the work, which includes development of a summary of findings.
4. Updated historic site documentation to be submitted to the Idaho SHPO on finalization of the project.

Proposed Methods and Procedures

1. Prior to initiation of the project CGA will meet with project fieldwork leads to acquaint them with the scope of the fieldwork as well as to provide an overview of specific items of archaeological interest to look for. Archaeological monitoring by a professional archaeologist who meets the Secretary of the Interior's qualifications (36 CFR Part 61) and has any specialized experience and expertise necessary to will take place during ground disturbing activities which have the potential to affect archaeological deposits within the work area.
2. The archaeological monitor will stand near the excavator and observe as sediment is pulled away from archaeological features 1, 3, 4 and 5 (figure 22 in the AAR report).
3. If features related to the layout are exposed during the ground disturbance, they will be documented on the site map, and photos will be taken.
4. Any new features or artifact concentrations will be described in the final report and added as an amendment to the archaeological site form.
5. Daily progress of the construction and monitoring work will be recorded. At the completion of the monitoring, the Archaeologist will prepare a report on the methods and results of the work, illustrated with maps, drawings, and photographs as appropriate.
6. Final project report of monitoring makes a statement that supports or denies the eligibility of the location for the National Register of Historic Places.

Discovery Procedures for Recording of Incidental Features and Artifacts.

If incidental or demonstrably non-NRHP eligible cultural materials or features are discovered during construction, the Monitor will immediately halt work at that location and notify the on-site Construction Supervisor. Incidental or demonstrably non-NRHP eligible cultural materials or features include—but are not limited to—isolated pre-contact or historic period artifacts, and cultural materials younger than 50 years old. The discovery area and a surrounding buffer zone shall then be delineated with flags tied to long stakes that are driven in to the ground. These stakes shall not be removed. The Monitor will thoroughly document and sample the cultural material. The buffer zone established around the discovery zone shall be large enough to allow ground disturbance activities to resume outside the buffer.

Protocol for Inadvertent Discovery of Potentially NRHP Eligible Cultural Resources.

If potentially NRHP eligible cultural resources are discovered, the Monitor will immediately halt work at that location and notify the on-site Construction Supervisor. Potentially NRHP eligible cultural materials include; evidence of prehistoric or historic features including postholes/molds, hearths, pits, walls, foundations, and other evidence of structural remains; shell midden, non-human bone, lithic debitage, formed-stone –bone –shell –wood or –fiber implements, historic-period glass and ceramics. The discovery area and a surrounding buffer zone will then be delineated with flags tied to long stakes that are driven in to the ground. These stakes shall not be removed. The buffer zone established around the discovery zone shall be large enough to allow ground disturbing activities to resume outside the buffer. The Monitor will then coordinate with the on-site Construction Supervisor to determine whether further impacts to the NRHP eligible cultural resources can be avoided in which case the Monitor will thoroughly document and sample the disturbed cultural material. If further impacts to the NRHP eligible cultural resources cannot be avoided, the Monitor shall contact GeoEngineers who will coordinate a response with the appropriate regulatory agencies.

Project Deliverables

1. Archaeological site update form
2. Report of findings to be submitted to DOE and Idaho SHPO

Summary for Avery Landing Monitoring

Columbia Geotechnical Associates (CGA) was present at the Avery Landing site (10SE476) during earthmoving activities in May 2013. The goal for the current investigation was for an archaeologist to observe and record subsurface deposits related to the remnants of the Avery Division Rail Yard observed in the initial cultural inventory (AAR Technical Report 1095; Hale and Roulette 2012). Further documentation of previously recorded (and unrecorded) surficial scatters and features as recommended in the AAR report would consist of the recording of each known feature by exposing the

subsoil, and documenting the cultural constituents within the subsoil, if present, to further determine the eligibility of the property with the NRHP (National Register of Historic Places). In addition to the recording of the cultural materials and features, AAR recommended that the onsite archaeologist brief any of the engineering and construction personnel of the nature of the site as an Archaeological site, and how to treat any cultural materials or features that might be discovered as remediation work on the site continues.

Results

Prior to CGA arriving on site, 10SE476 was grubbed and cleared. Surficial deposits recorded in the AAR survey have been removed from the site (Scatters 1-5). Features 1, 3 and 5 were cleared by toothless bucket and trenches were dug in judgmental locations to determine total dimensions including width, height, and depth. Feature 4, the turntable, was surficially revealed with a toothless bucket and a cross section was dug from west to east from inside the perimeter of the exposed concrete structure to determine total dimensions. All excavated soils were replaced back into trenches. Subsoils in and around features 1,3, and 5 consisted of original fill and a scattering of railroad debris including rails, a boxcar door, and railroad ties as well as dense amounts of broken concrete consistent with building demolition. Subsoils within feature 4 seemed to be comprised of wood debris and a mixture of modern and historic refuse including modern cans and bottles, bedsprings, car parts, and household goods. It is likely the large opening left by the removal of the roundhouse served as a repository for the 'junk' on the property that accumulated after it was officially taken down in the 70's. Cultural material within feature 4 seems consistent with descriptions of material observed at surface Scatter 5.

Conclusions and Recommendations

CGA followed recommendations in the initial AAR cultural resource survey that 1) previously recorded and unrecorded cultural materials and/or features be recorded as they appear in the subsurface and 2) on site personnel are given a verbal synopsis of what might be considered an important historical resource and possible actions to take in case of an inadvertent discovery. The AAR report also states that only areas near the rail yard structures (Features 1, 3, 4 and 5) need to be monitored by an archaeologist as remediation progresses. Based on the results of the site work, no new data exists to change the draft AAR determination that the site is eligible for the National Register of Historic Places. Because the exploratory excavations conducted in May 2013 to further document features at the site gathered adequate information to complete the archaeological site characterization, no additional archaeological oversight for the project as it currently stands is warranted.

ABSTRACT

This report describes the results of a cultural resources survey of a 12-acre tract that contains the Avery Division rail yard where contaminated sediments are to be removed. Applied Archaeological Research, Inc. (AAR), conducted this study to assist the Environmental Protection Agency in complying with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800. It follows a Class I literature review conducted by AAR. Based on the information presented in that report, it was AAR's opinion that the remediation site had considerable potential to contain historic-era archaeological deposits related to the Chicago, Milwaukee, St. Paul & Pacific Railroad, also known as the Milwaukee Road. In the earlier report, AAR recommended that an archaeological field study should be conducted at the remediation site before cleanup activities were implemented. The Idaho State Historic Preservation Office reviewed AAR previous report and concurred with that recommendation.

The results of the current project indicate that the Avery Division rail yard is represented archaeologically by several surface features and scatters of historical or likely historical artifacts, some of which are distinctly associated with the railroad, and demolition debris. The features represent the architectural remains of razed structures or demolished railroad facilities such as a turntable, a roundhouse, and sections of track. In 1976, when it was standing, the roundhouse was recorded as a cultural resource that was designated 10SE476. AAR recommends that the site designation be retained but that it is expanded to include the archaeological remains of the roundhouse and other elements of the Avery Division rail yard.

The surface features and scatters of historical artifacts are not likely to meet the registration requirements for listing on the National Register of Historic Places (Criterion D) because their information potential is low. However, the current study was limited to a surface inspection and subsurface archaeological deposits different from those observed on the surface may be present and might have the potential to yield important information. Also, buried parts of the engineering and architectural features may be sources of important information.

The cultural inventory of the Avery Division rail yard is not considered to be complete because the presence or absence of subsurface deposits related to site 10SE476 has not yet been verified. To complete the cultural resources inventory and to provide a more definitive evaluation of the site's eligibility to be listed on the National Register of Historic Places AAR makes two recommendations in consideration of the site's industrial character and the fact that much of it is covered by, and possibly contained within, contaminated sediment. The first is that a cultural resource monitor watch any earthmoving or other ground-disturbing activities in the part of site 10SE476 that contains features related to the turntable and roundhouse (Features 1, 3, 4, and 5). The purpose of the monitoring would be to collect details on the layout, construction, and engineering of those facilities above and beyond those observed at the ground surface. Because the site is contaminated, the cultural resources monitor will need to have had hazardous waste operations and emergency response training.

The second recommendation is that all personnel involved in remediation activities be made aware that the cleanup site is also an archaeological site that has potential to contain buried archaeological deposits. Inadvertent discovery of cultural deposits during subsurface earthmoving is possible and highly probable. Should concentrations of personal- or work-related artifacts be inadvertently uncovered, work in the area of the artifacts should stop until the finds can be documented and assessed. It is AAR's recommendation that structural debris, such as pieces of concrete and brick, metal pipe, and similar materials would not warrant a work stoppage. The planned remediation excavations will directly impact site 10SE476. However, the recommended monitoring and implementation of inadvertent discovery procedures will serve to mitigate those impacts. If the recommendations are followed, AAR recommends a finding of no adverse effect for this undertaking on historic properties.

SUMMARY AND RECOMMENDATIONS

Summary

This report has described the results of a cultural resources survey of the Avery Division rail yard, where contaminated sediments are to be removed. AAR conducted this study to assist the EPA in complying with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800. It follows a Class I literature review conducted by AAR that included a detailed context for the historical land use of the Avery Division rail yard and an assessment of its potential to contain archaeological deposits (Roulette and McCormick 2010).

The results of the cultural resources survey indicate that the Avery Division rail yard is represented archaeologically by several surface features and scatters of historical or likely historical artifacts, some of which are distinctly associated with the railroad, and demolition debris. The features represent the architectural remains of razed structures or demolished railroad facilities such as a turntable, roundhouse, and boiler house. The scatters of artifacts and demolition debris are dispersed across the Avery Landing landform and contain low-density cultural deposits. As observed, the site is not likely to meet the registration requirements for listing on the NRHP, because its information potential is low. However, as described above, subsurface archaeological deposits could be present. If such deposits are present, they might have the potential to yield important information.

Other historical uses of the Avery Landing landform are not represented archaeologically, at least by surface features and artifact scatters. No archaeological evidence was observed that could be clearly associated with the CCC camp known to have been established at Avery Landing in 1938 or with use of the landform by Potlatch during the historic period, 1944 to 1962.

Recommendations

The cultural inventory of the Avery Division rail yard is not considered to be complete because the presence or absence of subsurface deposits related to site 10SE476 has not yet been verified. To complete the cultural resources inventory and to provide a more definitive evaluation of the site's eligibility to be listed on the NRHP AAR makes two recommendations in consideration of the site's industrial character and the fact that much of it is covered by, and possibly contained within, contaminated sediment. The first is that a cultural resource monitor watch any earthmoving or other ground-disturbing activities in the part of site 10SE476 that contains Features 1, 3, 4, and 5, that are related to the turntable and roundhouse (Figure 22). During monitoring an archaeologist would closely observe the excavations in the area where the turntable and roundhouse were located to ensure that important details on the layout, construction, and engineering of those facilities are not destroyed by the remediation efforts. Excavations in the area shown shaded in Figure 22 should involve a piece of equipment mounted with a toothless bucket removing shallow lifts of no more than 6-inch thickness. If at any point during the excavations the monitor encounters features (or other type of archaeological deposits) and believes that further examination of them is warranted, all ground disturbances must halt within 100 ft of the designated area. Because of details of layout, construction, and engineering that are of interest may not be adequately exposed using heavy equipment, it may be necessary for the cultural resources monitor to manually excavate loose soil away from exposed features using a flat-nosed shovel. Note that because the site is contaminated, the cultural resources monitor will need to have had hazardous waste operations and emergency response training.

It is expected that the subsurface part of the features present in and around where the turntable and roundhouse were located are shallowly buried so that after they been adequately documented, excavations using a toothed-bucket and thicker lifts may resume without a monitor in place.

The second recommendation is that all personnel involved in remediation activities be made aware that the cleanup site is also an archaeological site that has potential to contain buried archaeological deposits and should be informed that any construction-related damage to potentially significant archaeological deposits is unlawful. Procedures should be in place and well understood by all personnel involved in the remediation effort on how to treat potentially significant archaeological deposits should they be inadvertently discovered.

It is likely and archaeological deposits will be uncovered during the clean-up activities. Not all, and possibly none, of the archaeological deposits that may be uncovered would be considered potentially significant. In general, significant cultural deposits would include personal- or work-related artifacts, rather than the structural remains of the rail yard itself. Significant deposits would include concentration of refuse generated by the workers at the rail yard. Such refuse could provide archaeological and historical insight into the working conditions and lifeways of the workers and also information relevant to the understanding of the history of the community of Avery and the history of the upper St. Joe river valley. If these types of archaeological deposits are inadvertently uncovered during the remediation excavations, all work in the area of the artifacts should stop until the finds can be documented and assessed.

It is likely that much if what may be uncovered during the excavations will have low information content and interpretive value. Archaeological deposits of this variety would include the general debris associated with the razing of the facility such as pieces of pipe, concrete, wood, window glass, and nails, as well as displaced remnants of architectural features such as pieces of concrete foundation or brick walls. They could also include architectural features such as concrete slabs associated with structures that are depicted on the 1915 map of the yard. It is AAR's recommendation that these varieties of archaeological materials may be removed as part of the normal remediation efforts and would not warrant further inspection or documentation by archaeologists.

The planned remediation excavations will directly impact site 10SE476. However, the recommended monitoring and implementation of inadvertent discovery procedures will serve to mitigate those impacts. If the recommendations are followed, AAR recommends a finding of no adverse effect for this undertaking on historic properties.